

Continued from before the article from *Wired Magazine*.

We already have such a record of a BPL system receiving accolades, money, and government support without being tested and despite its seeming to violate the laws of physics. Here we are saying that industry has never adequately tested their proposed BPL systems for interference potential to radio spectrum users, and their reassurances would go against the laws of physics.

Where are we now?

Home networking's moment has arrived thanks to a convergence of technologies. It starts with broadband Internet access, which has reached critical mass with nearly 20 million American homes boasting DSL or cable modems. That solves the "last mile" problem, delivering broadband to the door. And fortunately, three new technologies have arrived to help solve the "last room" problem. Depending on which you choose, every phone jack, every power outlet, even the air itself can deliver broadband content to every corner of the house at a cost of a few hundred dollars.³

Since its "friendly acquisition" of AT&T Broadband last November, Comcast - the largest broadband Internet provider in the United States -- has been committed to an accelerated expansion of services. Over the last three years, the company has spent nearly \$300 million on service upgrades in Oregon and southwest Washington alone. On a more local level, 11.5 percent of the 117,000 residents who are currently eligible for broadband Internet in Eugene subscribe to Comcast.

Meanwhile, Qwest has worked hard to catch up. Last spring, the phone and DSL Internet service provider announced an incremental \$75 million expansion campaign for its 14-state region.

"We're doing what we can to expand," Qwest spokeswoman Silvia McLachlan said, although she couldn't reveal the company's current market share. "Eugene is a key market for us." In order to qualify for Qwest DSL in Lane County, the actual phone wire connecting a household to the central office must be less than 18,000 feet long or within a three-mile radius. ...

"Stay tuned," she said for those outside the coverage area. "Hopefully your home will be implemented soon." Qwest's advice doesn't surprise Williams. "Phone companies have been telling customers to 'hold tight' for some time now," he said. "With broadband high-speed Internet, all you need is a cable TV line to qualify." By high-speed, Williams means a 1,500 Kbps download speed for about \$55 a month with basic cable television. Qwest offers a maximum 640 Kbps download speed for a similar price, though a phone line is required.

Williams said having the higher speed is Comcast's key advantage in student communities.

"It's primarily broadband users who are downloading lots of music," he said.

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As if 1.5 megabit isn't fast enough, Comcast is currently testing double the downloading speed -- over 3 megabit -- in markets in Atlanta and Pittsburgh for the same price. Williams said the project is just one of several ways Comcast is trying to improve its services. "This is a very competitive market," he said. "We'll have to stay competitive to stay in business."⁴

It seems to me that high speed internet access is in a robustly competitive field even *without BPL* either in-house or access. If in-house BPL is allowed to go forward, it should be filtered to eliminate use of any amateur band, hams with their sensitive receivers in proximity to many living quarters, and access BPL must be banned altogether because it could easily overwhelm users of higher power than hams.

I submit the analogy of posters and ads on campus at the University of Oregon in Eugene. There are a few bulletin boards for them. They are not allowed to be posted on every utility pole around because that would destroy the esthetics of the grounds. You don't waste something valuable and irreplaceable just to get every last mile out of business.

ARRL Chief Executive Officer David Sumner, K1ZZ, declared, "The technical showings submitted by the ARRL and others in response to the Commission's Notice of Inquiry (NOI) in ET Docket No. 03-104 clearly establish that BPL is a significant source of radio spectrum pollution. It cannot be implemented without causing harmful interference to over-the-air radio services." ... Recently, the National Telecommunications and Information Administration (NTIA) <<http://www.ntia.doc.gov>>-- which regulates spectrum allocated to federal government users--expressed "broad concerns" about interference to government users and launched an extensive modeling, analysis and measurement program for BPL. In his letter, Sumner reminded Abernathy that the radio spectrum is a precious natural resource. "To squander that resource simply to add a redundant, unnecessary, and relatively poorly performing 'last mile' connection for consumers, is unconscionable," he said.⁵

If you are looking for someone who is behaving irrationally, I suggest you take a gander at BPL industry.

Sincerely,
Earl S. Gosnell III

⁴"Comcast accelerates area service expansion", Caron Alarab, News Reporter, *Oregon Daily Emerald* - Saturday, October 04, 2003

⁵The ARRL Letter, Vol. 22, No. 38, September 26, 2003